IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) MICHAEL WILLIAMS,)
Plaintiff,)
vs.) 12-CV-128 GKF-PJC
(1) OCWEN LOAN SERVICING, LLC) The Honorable Gregory K. Frizzell
Defendant.	<i>)</i>)

ANSWER TO COUNTERCLAIM

Plaintiff, Michael Williams, for his Answer to Defendant's Counterclaim, alleges and states as follows:

- 1. Plaintiff is without information to enable him to either admit or deny the allegations contained in Paragraph 1 of the Counterclaim.
- 2. Plaintiff is without information to enable him to either admit or deny the allegations contained in Paragraph 2 of the Counterclaim.
 - 3. Admitted.
- 4. Denied. Mrs. Williams specifically requested the "transfer of assignment document," which she described as a notarized document that assigned the loan to Defendant.
 - 5. Denied. Ocwen sent documents to Plaintiff not requested by Mrs. Williams.
- 6. Paragraph 6 contains no allegations against Plaintiff. To the extent that Paragraph 6 contains any allegations, they are denied.
- 7. Plaintiff denies the allegations contained in Paragraph 7 of the Counterclaim.

 Plaintiff's claims against Defendant detailed in his Complaint.

- 8. Plaintiff denies the allegations contained in Paragraph 8 of the Counterclaim.
- 9. Plaintiff denies the allegations contained in Paragraph 9 of the Counterclaim.

AFFIRMATIVE DEFENSES

- 10. Failure to state a claim.
- 11. Estoppel.
- 12. Plaintiff reserves the right to amend this Answer as a result of any discovery conducted.
- 13. Plaintiff reserves the right to add additional claims that may arise as a result of any discovery conducted.

WHEREFORE, having fully answered, Plaintiff, Michael Williams, requests that the relief requested by Defendant in the Counterclaim be denied, that Plaintiff be awarded damages for the claims asserted in his Complaint, and such other relief as the Court deems just and equitable.

Respectfully Submitted,

/s/ Victor R. Wandres
Victor R. Wandres, OBA #19591
PARAMOUNT LAW
115 W. 3rd St., Ste. 411
Tulsa, OK 74103
(918) 200-9272 voice
(918) 895-9774 fax
victor@paramount-law.net

CERTIFICATE OF SERVICE

I, Victor R. Wandres, state that on October 29, 2012, I caused the foregoing pleading to be electronically served on the party listed below pursuant to the Court's ECF system:

Brian Rayment Kivell, Rayment & Francis, P.C. 7666 East 61st St. Suite 550 Tulsa, OK 74133

/s/ Victor R. Wandres